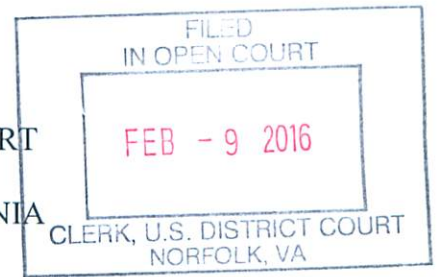


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:16cr10
v.)	
)	
INAYA MITCHELL,)	
)	
Defendant.)	

STATEMENT OF FACTS

If this case were to proceed to trial, the evidence presented by the United States would establish the following beyond a reasonable doubt:

1. From in or about May 2014 through August 2015, in the Eastern District of Virginia, INAYA MITCHELL, the defendant, devised a scheme to defraud the Social Security Administration, and to obtain money from it by means of materially false and fraudulent pretenses, representations and promises, as described below.

2. At all material times, MITCHELL was employed by the Social Security Administration as a service representative at a district office in Portsmouth, Virginia. She had computer access to Social Security Administration beneficiary information, including bank account data for the direct deposit of benefit payments into the bank accounts of beneficiaries.

3. The object of the scheme devised by MITCHELL was to obtain monies for herself by fraudulently processing computer changes to Social Security Administration beneficiary account information so that benefit payments would be deposited directly into prepaid reloadable debit card accounts that she opened at several financial institutions in the names of beneficiaries.

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4. MITCHELL fraudulently processed computer changes to the bank account information of approximately nine separate Social Security Administration beneficiaries, so that benefit payments would be deposited directly into prepaid reloadable debit card accounts that she opened in the names of said nine beneficiaries.


5. In two of those instances, the beneficiaries were deceased but MITCHELL fraudulently made computer changes to their accounts to indicate that they were still alive and entitled to benefits.

6. As a result of the scheme, MITCHELL fraudulently attempted to divert the total sum of approximately \$32,965.78 in beneficiary payments into prepaid reloadable debit card accounts opened by her in the names of nine beneficiaries. MITCHELL was blocked from accessing this money as a result of action taken by the financial institutions where she had opened said accounts.

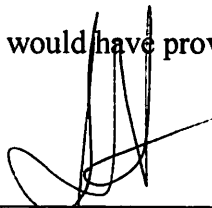
7. On or about May 3, 2014, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice, MITCHELL transmitted and caused to be transmitted, by means of a wire communication in interstate commerce, certain signs, signals, pictures and sounds, that is, an electronic transmission by computer from Portsmouth, Virginia to the United States Treasury Department in Kansas City, Missouri, which processed a change in the direct deposit information of a Social Security Administration's beneficiary account.

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Dana J. Boente
United States Attorney

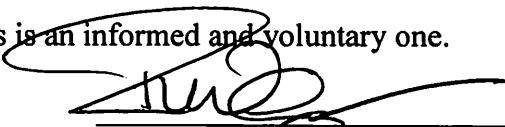
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I hereby stipulate that the above Statement of Facts is true and accurate, and that if this case had proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Inaya Mitchell

I have reviewed the above Statement of Facts with Inaya Mitchell and her decision to stipulate to the accuracy of these facts is an informed and voluntary one.



Robert L. Wegman
Counsel for the defendant

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